

EXHIBIT A  
SUMMONS AND COMPLAINT



**Service of Process  
Transmittal**

11/27/2018

CT Log Number 534475923

**TO:** Lara Kim  
Korean Air Lines Co., Ltd.  
2000 Powers Ferry RD, Suite 100  
Marietta, GA 30067

**RE: Process Served in Georgia**

**FOR:** Korean Air Lines Co., LTD (Domestic State: GA)

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** LAM LUC, Pltf. vs. KOREAN AIR LINES CO., LTD, et al., Dfts.

**DOCUMENT(S) SERVED:** Summons, Complaint

**COURT/AGENCY:** Fulton County State Court, Fulton, GA  
Case # 18EV005651

**NATURE OF ACTION:** Personal Injury - Failure to Maintain Premises in a Safe Condition - 11/25/2016

**ON WHOM PROCESS WAS SERVED:** C T Corporation System, Lawrenceville, GA

**DATE AND HOUR OF SERVICE:** By Process Server on 11/27/2018 at 15:34

**JURISDICTION SERVED :** Georgia

**APPEARANCE OR ANSWER DUE:** Within 30 days after service

**ATTORNEY(S) / SENDER(S):** Sammie D. Carson  
CARSON LAW FIRM, INC.  
4470 Satellite Blvd. Suite 101  
Duluth, GA 30096  
(770) 695-0607

**ACTION ITEMS:** SOP Papers with Transmittal, via UPS Next Day Air , 1ZX212780124160400  
Email Notification, Lara Kim larakim@koreanair.com

**SIGNED:** C T Corporation System

**ADDRESS:** 289 S Culver St.  
Lawrenceville, GA 30046-4805

**TELEPHONE:** 214-932-3601

GEORGIA, FULTON COUNTY

DO NOT WRITE IN THIS SPACE

STATE COURT OF FULTON COUNTY  
Civil Division

CIVIL ACTION FILE #: \_\_\_\_\_

Lam Luc

Plaintiff's Name, Address, City, State, Zip Code

vs.

Korean Air Lines Co., LTDKorean Air Catering CenterKorea Airport Services Co. LTD & Bradcal, Inc.

Defendant's Name, Address, City, State, Zip Code

TYPE OF SUIT	AMOUNT OF SUIT
<input type="checkbox"/> ACCOUNT	PRINCIPAL \$ _____
<input type="checkbox"/> CONTRACT	
<input type="checkbox"/> NOTE	INTEREST \$ _____
<input type="checkbox"/> TORT	
<input checked="" type="checkbox"/> PERSONAL INJURY	ATTY. FEES \$ _____
<input type="checkbox"/> FOREIGN JUDGMENT	
<input type="checkbox"/> TROVER	COURT COST \$ _____
<input type="checkbox"/> SPECIAL LIEN	
*****	
<input checked="" type="checkbox"/> NEW FILING	
<input type="checkbox"/> RE-FILING: PREVIOUS CASE NO. _____	

## SUMMONS

TO THE ABOVE NAMED-DEFENDANT:

You are hereby required to file with the Clerk of said court and to serve a copy on the Plaintiff's Attorney, or on Plaintiff if no Attorney, to-wit:

Name: Sammie CarsonAddress: 4470 Satellite Blvd. suite 101City, State, Zip Code: Duluth, GA 30096Phone No.: 770-695-0607

An answer to this complaint, which is herewith served on you, should be filed within thirty (30) days after service, not counting the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint, plus cost of this action. **DEFENSE MAY BE MADE & JURY TRIAL DEMANDED**, via electronic filing through E-file GA or, if desired, at the e-filing public access terminal in the Self-Help Center, at 185 Central Ave., S.W., Ground Floor, Room TG300, Atlanta, GA 30303.

11/20/2018 5:40 PM

LeNora Ponzio, Chief Clerk (electronic signature)

If the sum claimed in the suit, or value of the property sued for, is \$300.00 or more Principal, the defendant must admit or deny the paragraphs of plaintiff's petition by making written Answer. Such paragraphs underlined will be taken as true. If the plaintiff's petition is sworn to, or if suit is based on an unconditional contract in writing, then the defendant's answer must be sworn to.

If the principal sum claimed in the suit, or value of the property sued for, is less than \$300.00, and is on a note, unconditional contract, account sworn to, or the petition sworn to, defense must be made by filing a sworn answer setting up the facts relied on as a defense.

## SERVICE INFORMATION:

Served, this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

DEPUTY MARSHAL, STATE COURT OF FULTON COUNTY

WRITE VERDICT HERE:

We, the jury, find for \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_. \_\_\_\_\_ Foreperson

(STAPLE TO FRONT OF COMPLAINT)

**IN THE STATE COURT OF FULTON COUNTY  
 STATE OF GEORGIA**

LAM LUC )

Plaintiff, )

v. )

Civil Action No. \_\_\_\_\_

KOREAN AIR LINES CO., )

LTD, )

KOREAN AIR CATERING CENTER, )

KOREA AIRPORT SERVICES CO LTD, )

BRADCAL, INC. )

Defendants. )

**JURY TRIAL DEMANDED**

**COMPLAINT**

**COMES NOW**, Plaintiff LAM LUC ("Mr. Luc" or "Plaintiff") hereby sues Defendant Korean Air Lines Co., LTD (or "Defendant"), and states the following:

**THE PARTIES**

1. Plaintiff LAM LUC ("Mr. Luc") is an adult individual who at all time relevant to this Complaint resided in the State of Georgia.

2. Defendant Korean Air Lines Co., LTD is a corporation duly formed and existing under the laws of the State of Georgia, who at all times relevant to this Complaint resided at 2000 Powers Ferry Rd. Suite 100, Marietta, Georgia, 30067. Service may be made upon Korean Air Lines Co., LTD at its registered agent address at C T Corporation Systems 289 S. Culver St, Lawrenceville, Georgia, 30046.

**JURISDICTION AND VENUE**

3. The Court has jurisdiction over Defendant because Defendant has a principal place of business in the State of Georgia and the amount in controversy is greater than \$15,000.00.



4. Venue lies in Fulton County because defendant Korean Airlines Co., LTD is located in Fulton County.

#### **GENERAL ALLEGATIONS**

5. This action results from a bodily injury that occurred on or about November 25, 2016 (the "Accident").

6. On November 25, 2016, Mr. Luc was on board with Korean Air Lines, Flight KE 035, from Seoul, South Korea to Atlanta, Georgia.

7. During the flight, Mr. Luc was served with a sealed meal by attendants of Korean Air Lines.

8. Surprisingly, a metal needle was contained inside of Mr. Luc's meal, causing the Accident.

9. As a direct and proximate result of Defendant's negligence, Mr. Luc sustained serious bodily injuries for which he received and will continue to receive medical treatments therefore, and, among others, has a claim for damages against Defendant for the following: abdominal pain; gum pain; bloody diarrhea; fright; neck pain; chest pain; dry throat; headache; pain in the mouth; teeth pain; rectal bleeding; gastrointestinal bleeding; anemia; anal fissures; hemorrhoids; dizziness; nausea; sleep disturbances; emotional distress; physical and bodily injuries; past, present and future pain and suffering; past, present and future emotional distress; past, present and future medical expenses; past, present and future lost wages; loss of consortium; diminished level of happiness; and, diminished ability to enjoy life.

10. Although not exhaustive, Mr. Luc has incurred medical expenses as a direct result of the bodily injury in the approximate amount of \$11,832.24 and in all probability will incur

additional medical bills as a proximate result of injuries he sustained through no fault of his own in the incident.


11. As a direct and proximate cause of the negligence of Defendant's, Plaintiff has suffered a loss of earning capacity to be pled with particularity by amendment.

12. Plaintiff's injuries are the direct and proximate result of the negligence of Defendant.

13. WHEREFORE, Plaintiff respectfully prays:

- a. That Plaintiff be awarded damages against the Defendant's in an amount determined by the enlightened conscience of impartial jurors;
- b. That this case be tried before fair and impartial jurors;
- c. That the costs of this action be cast upon the Defendant; and
- d. That Plaintiff has such other and further relief as is allowed by law.

Respectfully submitted this 20 day of November, 2018.

  
\_\_\_\_\_  
Sammie D. Carson, Jr., Esquire  
Georgia Bar No.: 996795

**CARSON LAW FIRM, INC.**  
4470 Satellite Blvd. Suite 101  
Duluth, Georgia 30096  
Telephone: (770) 695-0607  
Facsimile: (888) 218-9547

*Attorney for Plaintiff*